UNITED STATES DISTRICT COURT EASTERN DISTRICT OF NEW YORK

IN RE AIR CARGO SHIPPING SERVICES ANTITRUST LITIGATION

MDL No. 1775

06-MD-1775 (JG) (VVP)

ORAL ARGUMENT WILL BE ON A DATE AND AT A TIME TO BE DESIGNATED BY THE COURT

THIS DOCUMENT APPLIES TO: ALL ACTIONS

NOTICE OF MOTION FOR SUMMARY JUDGMENT ON ISSUES OF ALTER EGO AND AGENCY BY DEFENDANT ATLAS AIR WORLDWIDE HOLDINGS, INC.

PLEASE TAKE NOTICE THAT defendant Atlas Air Worldwide Holdings, Inc.

("AAWW"), pursuant to Rule 56 of the Federal Rules of Civil Procedure, hereby moves for summary judgment on all claims against AAWW in Plaintiff's First Consolidated Amended Complaint, and for such other and further relief as the Court deems just and proper. The grounds for the motion are set forth in more detail in the AAWW's accompanying Memorandum of Law in Support of its Motion for Summary Judgment and the supporting declarations and exhibits.

Oral argument on the AAWW's motion shall be on a date and at a time to be designated by the Court.

Dated April 24, 2015

Respectfully submitted,

/s/ Harvey J. Wolkoff_

HARVEY J. WOLKOFF

GREGORY L. DEMERS

DAVID A. YOUNG

ROPES & GRAY LLP

Prudential Tower

800 Boylston Street

Boston, MA 02199-3600

Tel: 617-951-7000

Counsel for Atlas Air Worldwide Holdings, Inc.,

Polar Air Cargo, LLC, and Polar Air Cargo

Worldwide, Inc.

CERTIFICATE OF SERVICE

I, David A. Young, hereby certify that on April 24, 2015, a true and correct copy of the foregoing motion was served on the following via ECF:

Robert N. Kaplan, Esq.
Gregory K. Arenson, Esq.
Gary L. Specks, Esq.
KAPLAN FOX & KILSHEIMER LLP
805 Third Avenue, 14th Floor
New York, NY 10022
(212) 687-1980
rkaplan@kaplanfox.com
garenson@kaplanfox.com
gspecks@kaplanfox.com

Michael D. Hausfeld, Esq.
William P. Butterfield, Esq.
Brent W. Landau, Esq.
Hilary K. Scherrer, Esq.
Melinda Coolidge, Esq.
HAUSFELD LLP
1700 K Street, NW, Suite 650
Washington, D.C. 20006
(202) 540-7200
mhausfeld@hausfeld.com
wbutterfield@hausfeld.com
blandau@hausfeld.com
hscherrer@hausfeld.com
mcoolidge@hausfeld.com

Howard J. Sedran, Esq.
Austin Cohen, Esq.
Keith J. Verrier, Esq.
LEVIN, FISHBEIN, SEDRAN &BERMAN
510 Walnut Street, Suite 500
Philadelphia, PA 19106
(215) 592-1500
hsedran@lfsblaw.com
acohen@lfsblaw.com
kverrier@lfsblaw.com

Hollis L. Salzman, Esq.
Meegan Hollywood, Esq.
ROBINS, KAPLAN, MILLER & CIRESI LLP
601 Lexington Avenue, Suite 3400
New York, New York 10022-4611
(212) 980-7400
hsalzman@rkmc.com
mfhollywood@rkmc.com

/s/ David A. Young
David A. Young